

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS ROBERT  
CINTRON TO NATIONAL POSTAL POLICY COUNCIL INTERROGATORY  
NPPC/USPS-T5-4 (REDIRECTED FROM WITNESS THRESS)  
(May 26, 2021)**

The United States Postal Service hereby provides its responses to the National Postal Policy Council's Interrogatory NPPC/USPS-T5-4 to United States Postal Service Witness Thress, redirected to Witness Cintron, issued on May 19, 2021.<sup>1</sup> Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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<sup>1</sup> The Postal Service believes that NPPC has exceeded the limit on interrogatories set forth in Rule 3020.117(a), pursuant to federal case law adopted by the Commission. Order No. 2080, Order Adopting Amended Rules of Procedure for Nature of Service Proceedings under 39 U.S.C. 3661 (May 20, 2014), at 44. Nevertheless, the Postal Service has chosen to respond to these interrogatories in lieu of filing a motion to be excused from doing so on numerosity grounds. The Postal Service's choice to accommodate NPPC in this specific instance should not be construed as a waiver of the Postal Service's right to seek excusal from any further interrogatories by NPPC on numerosity or other grounds, or from any arguably excessive interrogatories by any other party in any other instance.

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May 26, 2021

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CINTRON TO  
NATIONAL POSTAL POLICY COUNCIL INTERROGATORY NPPC/USPS-T5-4  
(REDIRECTED FROM WITNESS THRESS)**

**NPPC/USPS-T5-4:** In the Commission's Advisory Opinion in Docket No. N2012-1 (at 70), the Commission stated: "The Postal Service will, at the end of Phase 1, be able to study the actual impact of eliminating the overnight service standard for inter-SCF First-Class Mail. This amounts to an approximately 20 percent reduction in volume currently receiving overnight delivery and could provide the Postal Service with the kind of historical data needed to undertake an econometric analysis of the relationship between speed of delivery and mailing behavior."

Did the Postal Service conduct the study suggested by the Commission? Please explain.

**RESPONSE:**

While the Postal Service did not conduct the precise study suggested by the Commission, it has studied the historical relationship between mail volumes and average days to delivery via econometric analysis in connection with this proceeding, and the results of the study are set forth in the direct testimony of Postal Service Witness Thomas Thress (USPS-T-5).